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11 Leasing, LLC, Northern Funding, LLC, SKS Associates, LLC, Jay
12 Cohen, Sara Krieger, Leonard Mezei and Sam Buono

13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**
15 **OAKLAND DIVISION**

16 RAINBOW BUSINESS SOLUTIONS, INC.,
17 ET AL.,

18 Plaintiffs,

19 v.

20 MBF LEASING LLC., ET AL.,

21 Defendants.
22

CASE NO. CV 10-01993 CW

JOINT STIPULATION PURSUANT TO
LOCAL CIVIL RULE 6-2(b) TO
EXTEND RETURN DATE OF PLAINTIFFS'
MOTION TO COMPEL
AS MODIFIED

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28 Case No. C 10-1993 CW

JOINT STIPULATION PURSUANT TO LOCAL CIVIL RULE 6-2 TO EXTEND TIME TO RESPOND TO
PLAINTIFFS' MOTION TO COMPEL AND PLAINTIFFS' MOTION TO SANCTION

1 WHEREAS, on February 18, 2014, Plaintiffs filed a motion to compel Leasing Defendants
2 (Northern Leasing Systems, Inc., MBF Leasing, LLC, Northern Funding, LLC, SKS Associates,
3 LLC, Jay Cohen, Sara Krieger, Leonard Mezei and Sam Buono) to produce documents in response
4 to Plaintiffs' Third Set of Requests For Production ("Plaintiffs' Motion");

5 WHEREAS, under the Local Rules, Leasing Defendants' response(s) to Plaintiffs Motion
6 would have been due March 4, 2014;

7 WHEREAS, the parties, through counsel, previously agreed, via joint stipulation pursuant
8 to Local Civil Rule 6-2(b), to extend Leasing Defendants time to respond to Plaintiffs' Motion
9 from March 4, 2014 to March 18, 2014, and to extend Plaintiffs' time to reply to March 25, 2014
10 with a hearing on Plaintiffs' Motion set for April 8, 2014;

11 WHEREAS, the parties, through counsel, previously agreed, via joint stipulation pursuant
12 to Local Civil Rule 6-2(b), to further extend Leasing Defendants time to respond to Plaintiffs'
13 Motion from March 18, 2014 to March 28, 2014, and to extend Plaintiffs' time to reply to April 2,
14 2014 with a hearing on Plaintiffs' Motion set for April 14, 2014

15 WHEREAS, Leasing Defendants submitted their opposition to Plaintiffs' Motion on
16 March 28, 2014 and Plaintiffs' submitted their Reply on April 2, 2014;

17 WHEREAS the parties, through counsel, have agreed, via joint stipulation pursuant to
18 Local Civil Rule 6-2(b), to further adjourn the hearing on Plaintiffs' Motion from April 14, 2014
19 to May 6, 2014 as a result of: the availability of Leasing Defendants' Counsel due to the Passover
20 holiday; the parties, through counsel, continuing to meet and confer in good faith to resolve the
21 issues set forth in Plaintiffs' Motion; and, Leasing Defendants continuing to produce documents
22 on a rolling basis;

23 WHEREAS, two prior extensions with respect to Plaintiffs' Motions have been jointly
24 requested as set forth above;

25 WHEREAS, this schedule will not impact any other scheduled dates;

26 NOW, THEREFORE, IT IS STIPULATED, by and between the undersigned parties
27 through their respective counsel of record, pursuant to Local Civil Rules 6-1(b) and 2(a), that the

28 Case No. C 10-1993 CW

1 Court shall adjourn the hearing on Plaintiffs' Motion from April 14, 2014 at 1:30 p.m. to May 6,
2 2014 at ~~9:00 A.M.~~ ^{2:00 P.M.} before Hon. Magistrate Judge Elizabeth Laporte.

3 DATED: April 8, 2014

6 Respectfully submitted,

7 MOSES & SINGER LLP

8 /s/ Scott E. Silberfein

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10 Robert Lillienstein (*Pro Hac Vice*)

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Attorneys for Plaintiffs

Pursuant to Local Civil Rule 6-2(a), and GOOD CAUSE APPEARING THEREFOR,

IT IS SO ORDERED. AS MODIFIED

DATED: April 11, 2014


THE HONORABLE ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE